

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

DR. BRIMA SYLLA, et al.,

Civil Case No. 23-5261

Plaintiffs,

-against-

AMAZON LABOR UNION, and CHRIS SMALLS,  
as President of the Amazon Labor Union,

Defendants.

**ORDER TO SHOW CAUSE  
FOR TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

-----X

Upon the annexed copy of the Verified Complaint, sworn to on July 10, 2023 and the Declaration of Arthur Z. Schwartz dated July 10, 2023, and the Declaration of Connor Spence, dated July 10, 2023, defendants, their officers, agents, and representatives are hereby

ORDERED TO SHOW CAUSE, on the \_\_\_\_\_ day of July, 2023, at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon of that date, in Courtroom \_\_\_\_\_, United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, 11201, why this Court should not enter an order, pursuant to Rule 65 of the Federal Rules of Court Procedure, directing defendant Amazon Labor Union, its agents and employees, pending trial of this matter,

a) to cease governing ALU pursuant to the Amended Constitution adopted in or about December, 2022, and to conduct the affairs of the defendant ALU in accordance with the Amended Constitution adopted in June 2022;

b) to hold an Election on or before August 30, 2023 for the positions of President, Vice President, Secretary Treasurer, Executive Secretary, and Steward Committee Chairperson at Warehouses JFK8 and LBJ5;

c) hold that election under the direction of a neutral Election Monitor, with expertise at running union elections, appointed by the Court, which appointee will create rules for the election, retain a third-party vendor to physically conduct the election, who will rule on objections raised by candidates running in the election prior to its conclusion, and who will certify the election, subject to review by this Court;

d) to post a Notice of that election and of a nomination meeting on or before July 25, 2023 in a manner best suited to reach all potentially eligible voters and nominees, utilizing email and by hand distribution;

e) to hold that nominations meeting no later than August 10, 2023 at a location near Amazon Fulfillment Center 8, in Staten Island, New York;

f) to allow anyone qualified to be a member to be nominated for a position subject to that election, as long as they signed a membership card within the year prior to the nominations meeting;

g) to allow an eligible member to be nominated by another member, by self-nomination, or by a sworn self-nominating form designed by the Election Monitor;

h) to hold that election via in-person voting, between 6am and 9pm, at a location near Amazon Fulfillment Center JFK8, in Staten Island, New York, open to all employees of Amazon, Inc. employed at Amazon Fulfillment Center 8 and Sorting Center 5, Staten Island, New York, who sign a membership card on or before the date and time they vote; and

i) to have those elected take office upon a report, to the Court, from the Election Monitor certifying the election; and granting such other and further relief as is just and equitable; and it is further

ORDERED that pending a hearing on this application, defendants, their agents, and attorneys, are temporarily restrained and enjoined from acting to discipline or retaliate against any Plaintiff in this matter; and it is further

ORDERED that personal service of this Order and the papers upon which it is based, be made by personal service upon any officer of the Amazon Labor Union, or upon counsel to the Amazon Labor Union, Julien, Mirer and Singla, by email and overnight mail, on or before \_\_\_\_\_, 2023 at \_\_\_\_\_.

Dated: Brooklyn, New York  
July \_\_\_\_\_, 2023

---

United States District Judge